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Interlochen Public Radio submits these Comments in response to the *Notice of Proposed Rule Making* in MM Docket 99-25 (Creation of a Low Power Radio Service). Interlochen Public Radio opposes the proposals in the *Notice* because we believe the Commission's assumptions regarding the need for such a service and its assumptions regarding technical issues are unfounded.

First, the Commission has assumed that consolidation has decreased independent voices in the industry, made entry harder and decreased diversity. A study by the National Association of Broadcasters shows that consolidation has not eliminated independent voices. In many markets (including major markets), substantial portions of stations remain standalones or duopolies. There is no indication that independent voices have been eliminated after the Telecommunications Act of 1996. The Commission also dismissed other options, such as Internet radio, too quickly. There are other alternatives to provide "voices" without degrading existing radio services.

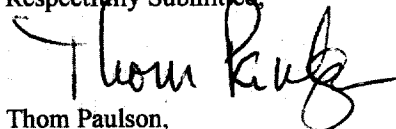
Most importantly, recognizing that under existing standards, very few LPFM stations could be located in large markets the Commission assumed that receivers have improved to the point that radios can reject 2nd and 3rd adjacent channel interference, and proposed to eliminate these protections. It based this assumption on unsubstantiated comments of LPFM supporters and without having conducted any receiver testing on its own. Allowing LPFM stations in existing markets will create new interference for millions of listeners and reduce the quality of radio service. Further, these LPFM stations would themselves be subject to interference from existing stations. The Commission cannot eliminate 2nd and 3rd adjacent channel protections.

In addition to the technical issues, the LPFM proposal will undermine the ability of stations to serve the public. An economic study from Strategic Policy Research ("SPR") shows that local stations will not be able to continue to offer quality local programming if LPFM is established. SPR concludes that the result of the LPFM proposal from an economic viewpoint will lead to a decrease in service from full power stations. The Commission also failed to consider the impact of its LPFM proposal on existing reading services for the sight-impaired. These services depend on subcarriers, and they could be wiped out if LPFM is implemented. Additionally, the Commission would have to grandfather all existing translators and boosters for both the LP1000 and LP100 service in order to ensure that the service provided by these stations – and depended on by listeners – is not interrupted.

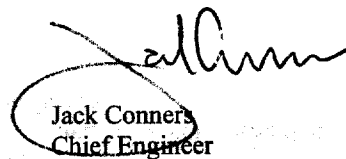
Finally, the Commission asked for comment on establishing a microradio service. In addition to the fact that microradio and LP100 stations are inherently inefficient uses of the spectrum, a microradio service would exacerbate other issues raised by the LPFM proposal. A microradio service must not be considered.

The Commission's LPFM proposal rests on a series of assumptions about the radio marketplace, about the technical standards needed for interference-free service, and about the legal and economic environment for radio service. There is no need for LPFM service; LPFM would create vast amounts of new interference and risk the radio industry's transition to digital; and LPFM would result in a net loss of service to the public. Since the assumptions supporting the LPFM proposal are not valid, the Commission should not authorize a low power radio service.

Respectfully Submitted,



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